

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PATRICK RYAN,	<i>Pat Ryan</i>)	
Plaintiff,)	C.A. No.: 04-11470 (MLW)
)	
v.)	
)	<i>- Allow</i>
INDEPENDENCE ASSOCIATES, INC.,)	<i>- enter</i>
and CONSTANCE GALLANT,)	
Defendants.	<i>Durine</i>)	
)	
)	

JOINT MOTION TO REMOVE STAY

The parties to the above-entitled action respectfully move, on a joint basis, that this Court remove the stay that was entered in this case while the parties attempted to mediate, and adopt the proposed case management schedule set forth herein. As grounds therefor, the parties state as follows:

- (1) At a status conference on July 28, 2005, this Court granted the parties' request to refer this case to the Court's Alternative Dispute Resolution program for purposes of mediation. In light of the parties' request to mediate, this Court stayed the deadlines contained in the Joint Statement of the Parties submitted in connection with the Rule 16 Conference.
- (2) On January 18, 2006, the parties attended a mediation before Magistrate Judge Alexander. Despite the parties' good faith efforts, they were unable to reach agreement on a resolution of this matter at the mediation.

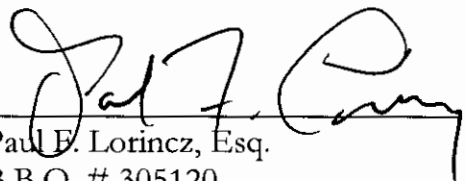
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- (3) Therefore, the parties request that this Court remove the stay that was entered while the parties attempted to mediate this case. Because discovery is complete, the parties propose the following schedule:


Deadline for filing summary judgment motions:	April 28, 2006 May 31	AW 8/2
Deadline for filing oppositions to summary judgment motions:	May 31, 2006 June 30	AW 8/2
Deadline for filing responses to oppositions to summary judgment motions:	June 14, 2006 July 14	AW 8/2
Final pretrial conference:	If necessary, to be scheduled by the Court following resolution of summary judgment motions.	
Trial date:	To be scheduled at final pretrial conference.	

WHEREFORE, the parties respectfully move, on a joint basis, that this Court remove the stay that was entered in this case while the parties attempted to mediate, and adopt the proposed case management schedule set forth herein.

The Plaintiff,
Patrick Ryan,
By his Attorneys,


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By their Attorneys,


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